

# **Exhibit 14**

# **Minnesota Proposals**

**MDL 3047 – 2024-12-09 Agency Discovery JLB**  
**Minnesota – Meta Proposal**

**Search Terms:** Meta made its most recent counterproposals to the Minnesota Department of Human Services and the Governor’s Office, and to the Department of Employment and Economic Development and the Management and Budget on November 22 and December 7, 2024, respectively.

**Minnesota Department of Human Services and Governor’s Office**

#	I. Search Strings for Youth Focused Agencies
	<b>Search Set 1 – Search Strings for Youth Focused Agencies</b>
1	(“social media” OR “social network” OR “Meta” OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
	<b>Search Set 2 – Youth Mental Health / Wellbeing Issues</b>
2	wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deficit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worri* OR lonel* OR alone OR therap* OR counsel* OR treatment*)
3	(“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)
4	(bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)
5	(violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)

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6	(addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”)
7	(eat* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
8	(sleep* w/3 (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*))
9	(negative w/3 (appearance OR experience OR affect* OR effect*))
10	(compar* w/5 (appearance OR social OR other* OR negative))
11	(body w/3 (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*))
12	(self w/3 (esteem OR harm OR control OR injur* OR mutilat* OR regulat*))
13	(Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc**”)
14	(svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)
	<b>Search Set 3 – Other Case Issues</b>
15	(polic* OR practice* OR presentation OR assembl* OR initiative* OR interven* OR prevent* OR limit* OR control* OR legislation OR advocacy OR lobby* OR legislat* OR law OR suspend* OR revok* OR fine* OR sanction* OR cancel* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie* OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)
	<b>II. Search Strings for Non-Youth-Focused Agencies</b>

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	All search strings referenced above run against below “Youth” gating terms with “AND” connector.
	(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

**Minnesota Department of Employment and Economic Development:**

#	I. Search Strings for Youth Focused Agencies
1	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Yik Yak” OR nsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”))”
2	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (wellness OR wellbeing OR well-being OR confidence OR self-confidence OR “mental health” OR “TMH” OR “ACE*” OR “adverse childhood experience” OR anxi* OR anti-anxi* OR depress* OR antidepress* OR sad* OR reclus* OR stress OR “attention deicit” OR “ADHD” OR posttraumatic OR “bi-polar” OR “bi polar” OR bipolar OR “BPD” OR insomnia OR scar* OR afraid OR angry OR mad OR worr* OR lonel* OR alone OR therap* OR counsel OR counseling OR counsels OR treatment*)”
3	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (“pro-ana” OR “BMI” OR overweight OR fat OR obes* OR diet* OR anorexi* OR

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	bulimi* OR orthorexi* OR appetite OR dysmorph* OR binge OR purge OR suicid* OR “self harm” OR “self-harm” OR selfharm OR unalive OR cutting*)”
4	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade* ) w/50 (bully* OR bullie* OR cyberbull* OR harass* OR sextort* OR transphob* OR homophob* OR racis* OR sexis* OR groom* OR hookup* OR solicit* OR pedophil* OR predator* OR sex* OR extort OR exploit*)”
5	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (violen* OR abus* OR assault* OR fight* OR altercation OR misbehav* OR misconduct* OR shoot* OR shot OR threat* OR gun* OR pistol OR rifle OR firearm OR rape* OR murder* OR traff* OR hate*)”
6	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (addic* OR hook* OR dopamine OR rabbithol* OR spiral OR “social reward” OR “social approval” OR “screen time” OR screentime staytime OR timespent OR “time spent” OR “engagement” OR impression* OR “monthly active users” OR “daily active users” OR “monthly active people” OR “daily active people” OR “weekly active users” OR “mandatory break” OR “limiting tool” OR “habit loop” OR “operant conditioning” OR “impulse control”))”
7	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 ((“eat* (problem* OR issue* OR trouble* OR diffirecult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)”~3))”
8	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 ((“sleep* (problem* OR issue* OR trouble* OR difficult* OR disorder* OR disab* OR agitat* OR behav* OR insufficient OR depriv*)”~3))”
9	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR

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	“U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 ((“negative (appearance OR experience OR affect* OR effect*)”~3))”
10	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 ((“compar* (appearance OR social OR other* OR negative)”~5))”
11	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (“body (accept* OR dissatisfaction OR positiv* OR image OR dysmorph*)”~3))”
12	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 ((“self (esteem OR harm OR control OR injur* OR mutilat* OR regulat*)”~3))”
13	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (Covid* OR coronavirus OR pandemic OR lockdown OR “lock* down” OR quarantine OR “social* distanc**”)”
14	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*) w/50 (svap* OR “ecig” OR “e-cig” OR cig* OR smok* OR nicotine OR tobacco OR pot OR cannabis OR marijuana OR heroin OR crack OR cocaine OR fent* OR opio* OR opia* OR meth OR methamphetamine OR oxy OR oxycontin OR painkiller* OR narcotic* OR drug* OR alcohol* OR Juul)”
15	“(teen* OR tween* OR adolescen* OR kid* OR youth* OR minor* OR young* OR child* OR underage* OR “under-age” OR juvenile* OR “pre-teen*” OR preteen* OR “U18” OR “under 18” OR “U13” OR “under 13” OR “gen* z” OR “gen-z” OR “gen* alpha” OR gen-a* OR scholar* OR School* OR student* OR pupil* OR grade*)

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	(legislation OR advocacy OR lobby* OR legislat* OR suspend* OR revok* OR fine* OR sanction* OR abandon* OR ban OR banned OR banning OR concern* OR problematic OR investigat* OR criminal OR charges OR conviction* OR arrest* OR “law enforcement” OR deceptive OR decei* OR fraud* OR defraud* OR cheat* OR lie OR lies OR misrepresent* OR mislead* OR schem* OR exploit* OR trick* OR conceal* OR hide OR omit* OR downplay* OR suppress* OR “cover up” OR “Consumer Protection Act” OR “consumer protection”)w/50) AND (“social media” OR “social network” OR Meta OR Facebook OR Instagram OR “Insta” OR Youtube OR Snapchat OR Snap OR Bytedance OR TikTok OR Twitter OR Tweet OR Roblox OR Discord OR Twitch OR Netflix OR Reddit OR Pinterest OR Tumblr OR telegram OR signal OR viber OR threema OR wechat OR kik OR textplus OR wickr OR troop OR YikYak OR “Vik Yak” OR finsta OR FB OR IG OR YT OR TT OR DM* OR “direct message”)
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**Counterproposal provided to Minnesota Management and Budget:**

(“Social Media” OR Facebook OR Instagram OR “Meta”) AND (Abuse OR Addiction OR Anxiety OR Compulsive OR Depression OR Effects OR Harm OR “Mental Health” OR Misuse OR Prevent OR Promote OR Psychological OR Report OR Sleep OR Studies OR Study OR Suicide OR Wellbeing OR Wellness)

**Custodians:** Meta proposes that the above search terms be run on each agency’s custodial documents (including email and other custodial data sources), and relevant non-custodial data sources, that cover the entire period from January 1, 2012, to April 1, 2024, which encompasses the same time period from which Plaintiffs seek discovery, and have plead as the “Relevant Time[]” in Plaintiffs’ Complaint. *See* ECF No. 969; MDL Compl. ¶ 19 (alleging a “Relevant Time[]” that starts “no later than 2012”). Meta proposes that the search terms set forth above should be run against at least the custodians listed below. Custodians designated with an asterisk (\*) have been affirmatively proposed and agreed to by the Minnesota AG’s office during the course of the Parties’ negotiations. To the extent the custodians below do not cover the relevant time period or all relevant topics for each agency, the State and/or agency should propose additional custodians to Meta, and Meta reserves the right to select additional custodians.

<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of the Governor	Hue Nguyen	Deputy Chief of Staff, Policy and Legislative Affairs
Office of the Governor	Kayla Castañeda	Communications Director

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Office of the Governor	Chris Schmitter	Chief of Staff
Department of Human Services	Teresa Steinmetz	Assistant Commissioner, Behavioral Health Administration
Department of Human Services	Sara Rose	Chief Administrative Officer
Department of Human Services	Barbie Hess	Executive Assistant
Department of Human Services	Diane Neal	Director Mental Health Services, Behavioral Health Administration
Department of Human Services	Marvin Davis	Deputy Director of DYCF Child Safety and Permanency, Department of Children, Youth, and Families
Department of Human Services	Sarah Berg	DHS Central Media Communications Manager
Department of Human Services	Jon Wittman	DHS Program Area Communications Manager
Department of Human Services	Wade Brost	Executive Director of Mental Health and Substance Abuse Treatment Services
Department of Human Services	Julie Marquardt	Deputy Assistant Commissioner and Assistant Medicaid Director
Department of Human Services	Justine Nelson	Research Scientist
Department of Human Services	Yvonne Goodsky	Deputy Director of DYCF Child Safety and Permanency
Department of Human Services	Dr. Maria Harmandayan	Medical Director of Mental Health and Substance Abuse Treatment Services
Department of Human Services	Mindy Rogers	Director of Health, Safety & Policy Quality
Department of Human Services	Kristine Preston	Deputy Assistant Commissioner, Behavioral Health Administration



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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Human Services	Eric Grumdahl	Assistant Commissioner, Behavioral Health Administration
Department of Human Services	James Thompson	Operations Data Practices and Compliance Specialist
Department of Human Services	Jen Sather	Director Substance Use Disorder Services
Department of Human Services	Bharti Wahi	Interim Assistant Commissioner of DCYF Child Safety and Permanency, Department of Children, Youth, and Families
Department of Human Services	Greta Bergstrom	DHS Communications Director
Department of Human Services	Martiga Lohn	DHS Central Media Administrative Officer
Department of Human Services	Lisa Wilder	DHS Agency Communications
Department of Human Services	Kaye Zarn Mills	DCT Director of Policy
Department of Human Services	Diogo Reis	Health Improvement and Benefit Design Division Director
Department of Human Services	Dr. KyleeAnn Stevens	Executive Medical Director for Behavioral Health
Department of Human Services	Jennifer Sommerfeld	DCYF Government Relations Director
Department of Human Services	Katie Miller	DCT Policy Coordinator
Department of Human Services	Jordan Collins	Policy Coordinator – Mental Health and Substance Abuse Treatment Services
Department of Employment and Economic Development	Natasha Jerde*	SSB Director

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<b>Agency</b>	<b>Custodian</b>	<b>Title</b>
Department of Employment and Economic Development	Tara Sullivan*	WDU Trainer
Department of Employment and Economic Development	Dacia VanAlstine *	Employment Specialist
Department of Employment and Economic Development	Hannah Edwards*	Employment Specialist
Department of Employment and Economic Development	Tou Yang *	Work Opportunity Navigator
Department of Employment and Economic Development	Courtney Wanek *	Director of Policy and Program Administration
Department of Employment and Economic Development	Sheila Koenig*	Youth Services Manager
Department of Employment and Economic Development	Shane DeSantis*	Transition/Pre-ETS Coordinator
Department of Employment and Economic Development	David Smith*	Employment Specialist
Department of Employment and Economic Development	Alana Strickler *	Employment
Department of Employment and Economic Development	Randi Lasher*	Work Opportunity Navigator

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Agency	Custodian	Title
Minnesota Management and Budget	Brittany Wright*	Program Manager for the Children’s Cabinet

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.

v.

Meta Platforms, Inc.; Instagram, LLC; Meta  
Payments, Inc.; Meta Platforms Technologies,  
LLC,

MDL No. 3047

Case Nos. 4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

Office of the Attorney General, State of Florida,  
Department of Legal Affairs

v.

Meta Platforms, Inc., Instagram, LLC., Meta  
Payments, Inc.

**DECLARATION OF BRADLEY SIMON  
REGARDING UNDUE BURDEN OF THE  
MINNESOTA DEPARTMENT OF  
HEALTH**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General

v.

Meta Platforms, Inc., Instagram, LLC, Facebook  
Holdings, LLC, Facebook Operations, LLC,  
Meta Payments, Inc., Meta Platforms  
Technologies, LLC, Siculus, Inc.

**IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION THIS DOCUMENT RELATES  
TO:**

4:23-cv-05448, 4:23-cv-05885; 4:24-cv-00805.

Declaration Of Bradley D. Simon Regarding Undue Burden of the Minnesota Department of  
Health (4:22-md-03047-YGR-PHK)

1 I, Bradley Simon, hereby declare and state as follows:

2 1. I am an Assistant Attorney General at the Minnesota Attorney General's Office. I  
3 represent the Minnesota Department of Health ("MDH") in relation to this matter. The  
4 information contained in this declaration is based upon my personal knowledge and information  
5 provided to me by MDH.

6 2. MDH informed me that it received a subpoena from Defendants Meta Platforms  
7 Inc., et al. ("Meta") in August 2024.

8 3. On behalf of MDH, I sent a letter to Meta's counsel in September 2024 objecting  
9 to the subpoena on numerous grounds.

10 4. MDH informed me that, subject to and without waiving its objections to the  
11 subpoena, MDH conducted a reasonable search within its agency for documents that were  
12 responsive to the subpoena.

13 5. MDH informed me that on November 8, 2024, MDH produced to Meta a total of  
14 13,671 documents, totaling 92,362 pages, that it identified as responsive to the subpoena and to  
15 Meta's Rule 34 discovery requests.

16 6. MDH informed me that on December 5, 2024, it sent a supplemental production to  
17 Meta, which included an additional approximately 947 pages of documents that it identified as  
18 responsive to Meta's Rule 34 discovery requests.

19 7. In response to a question from Meta about MDH's document collection efforts,  
20 MDH provided a written explanation of its efforts to identify and discover responsive documents  
21 and data. MDH explained that these efforts included identifying divisions or offices that, due to  
22 the nature of their activities, could have documents relevant to the subject matter of the litigation;  
23 consulting with leadership of relevant divisions or offices to identify the programs and particular  
24 staff within the division or office most likely to have documents relevant to the subject matter of  
25 the litigation; and instructing identified programs and staff to collect all documents, in all formats,  
26 relevant to the subject matter litigation. MDH also identified in its response to Meta some of the  
27 divisions and offices within its agency that it searched and described the major categories of  
28

1 relevant documents that were identified and collected. I understand this information was  
2 communicated to Meta in a letter from Caitlin Micko, counsel for Plaintiff State of Minnesota, to  
3 Meta's counsel dated November 27, 2024.

4 8. I understand that Meta subsequently requested clarification from MDH as to  
5 whether MDH searched for documents addressing causes of teen mental health issues separate  
6 and apart from social media.

7 9. On December 3, 2024, on behalf of MDH, I sent a written response prepared by  
8 MDH to Meta to clarify that MDH's search was not limited to issues related to social media.  
9 MDH provided examples to Meta of documents and data that, according to MDH, it had produced  
10 to Meta that related to child and teen behaviors that were wholly unrelated to social media.

11 8. On December 3, 2024, I attended a meeting with Meta's counsel to meet and  
12 confer regarding discovery. At that meet and confer, Meta's counsel had only one question for  
13 MDH: whether MDH's search for documents included the entire time period relevant to the  
14 litigation. I answered that I believed it did, but that I would confirm the answer with MDH.  
15 Meta's counsel had no other questions or concerns related to MDH's production of documents  
16 and its cooperation with discovery in this matter.

17 9. On December 3, 2024, after conferring with MDH, I wrote an e-mail to Meta's  
18 counsel and confirmed that, according to MDH, it had searched its agency for documents going  
19 back to January 1, 2012. I provided Meta's counsel some examples of documents and data that  
20 were from 2012 and 2013, and that, according to MDH, were included in its production to Meta.

21 10. On December 4, 2024, I received an e-mail from Meta's counsel, in which it stated  
22 that "Meta is not seeking additional information from MDH at this time."

23 11. I have not received any subsequent communication from Meta, directed to MDH,  
24 raising any concerns with MDH's production of documents or seeking any additional information  
25 or documentation from MDH.

26 12. In summary, MDH has been cooperative in this matter by producing documents  
27 from its agency that it identified as responsive, voluntarily supplementing its production with  
28

1 additional documents it identified after its initial production, communicating its collection process  
2 and efforts to Meta, and answering Meta's follow-up questions. Despite MDH's efforts and  
3 cooperation, Meta appears to still claim that MDH has not complied with discovery obligations  
4 and appears to demand that MDH restart its search and collection process from scratch. MDH  
5 informs me that it believes that conducting a new search using search terms and custodians would  
6 be largely redundant of its previous search and collection efforts, and that it would be unduly  
7 burdensome to its agency given the amount of time and resources MDH has already expended to  
8 search for and produce documents to date. MDH informs me that it continues its willingness to  
9 cooperate with Meta and invites Meta to communicate any follow-up questions it has based on  
10 MDH's previous productions.

11 I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct.

13 Executed on December 8, 2024, in Ramsey County, Minnesota.

14  
15 */s/ Bradley D. Simon*

16 \_\_\_\_\_  
BRADLEY D. SIMON